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Rebecca Lucero, and Chris Greathouse*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SHUSHAN SADJADI, an individual,

Plaintiff,

vs.

CLARK COUNTY SCHOOL DISTRICT, a
political subdivision of the State of Nevada;
MARBELLA ALFONZO, an individual;
MATTHEW SPURK, an individual; PATRICIA
CHANDLER, an individual; RAY NEGRETE,
an individual; REBECCA LUCERO, an
individual; CHRIS GREATHOUSE, an
individual, and DOES 1-X, inclusive;
Defendants.

CASE NO.: 2:24-cv-00079-JAD-EJY

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE EARLY
NEUTRAL EVALUATION SESSION**

(First Request)

Defendants Clark County School District, Patricia Chandler, Ray Negrete, Rebecca Lucero, Chris Greathouse (the “CCSD Defendants”), by and through their undersigned counsel, HOLLEY DRIGGS; Defendant Marbella Alfonzo (“Defendant Alfonzo”), by and through her undersigned counsel, LITTLER MENDELSON, P.C.; and Plaintiff Shushan Sadjadi (“Plaintiff”),

1 by and through her undersigned counsel, BRIAN K. BERMAN, CHTD. (collectively the
2 “Parties”); hereby respectfully submit this stipulation and proposed order to continue the early
3 neutral evaluation session currently scheduled for August 20, 2024 for approximately 90 days,
4 subject to the calendar and convenience of the Court, in order to allow the Parties to complete
5 additional discovery prior to revisiting settlement discussions before the Magistrate.

6 This is the first request for a continuance of the early neutral evaluation session, which is
7 being made in good faith and not for purposes of delay. The Parties state the following in support
8 of this request:

9 **I. PROCEDURAL OVERVIEW**

10 Plaintiff filed the Complaint in Clark County District Court on December 12, 2023. On
11 January 9, 2024, Defendants removed the case to this Court pursuant to 28 U.S.C. § 1331 [ECF
12 1]. On January 16, 2024, the CCSD Defendants filed their motion to dismiss [ECF 5].

13 Following full briefing and a hearing on February 21, 2024, the Order [ECF 14] granting
14 in part and denying in part that motion was filed on February 21, 2024. Subsequently, Plaintiff
15 filed her First Amended Complaint [ECF 16] on March 3, 2024.

17 A stipulation for a substitution of attorneys [ECF 21] was filed on April 2, 2024, which
18 substituted Defendant Alfonzo’s current undersigned counsel, Littler Mendelson, P.C. in place of
19 prior counsel, Holley Driggs. Subsequently, the CCSD Defendants filed their Answer [ECF 26]
20 on April 8, 2024.

21 On April 22, 2024, Defendant Alfonzo filed her Motion to Dismiss [ECF 29]. Following
22 full briefing and a hearing on June 3, 2024, the Court’s Order [ECF 39] granting in part and
23 denying in part that motion was filed on June 3, 2024.

24 The Second Amended Complaint [ECF 43] was filed on June 18, 2024. Defendant Alfonzo
25 filed her answer to the Second Amended Complaint [ECF 47] on July 2, 2024. The CCSD
26 Defendants filed their answer to the Second Amended Complaint [ECF 48] on July 12, 2024.
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II. STATUS OF DISCOVERY AND THE EARLY NEUTRAL EVALUATION SESSION

On May 23, 2024, the Parties participated in good faith in an early neutral evaluation session before the Honorable Magistrate Judge Brenda Weksler [ECF 37]. During the early neutral evaluation session, while the Parties were unable to reach a resolution of their dispute, the Parties participated in good faith negotiations and agreed, in consultation with the Magistrate, to continue the early neutral evaluation session to a later date in order that their negotiation efforts could benefit from discovery. As a result, the early neutral evaluation session was continued at that time to August 20, 2024 at 1 p.m.

On June 7, 2024, the parties held their Fed. R. Civ. P. 26(f) conference, and on June 10, 2024, the parties filed their Stipulated Discovery Plan and Scheduling Order, which was approved by the Court [ECF 41]. On June 21, 2024, the CCSD Defendants and Defendant Alfonzo made their respective initial disclosures. Plaintiff made her initial disclosures on July 26, 2024.

On July 18, 2024, the Parties submitted their First Stipulation and Proposed order to Extend Discovery Deadlines [ECF 49], which was approved by the Court [ECF 50] and extended the remaining deadlines in the case by 120 days. The current discovery cutoff is February 4, 2025.

III. REASONS WHY THE PARTIES DESIRE TO CONTINUE THE EARLY NEUTRAL EVALUATION SESSION.

The Parties have been cooperating with one another in good faith in order to complete their respective initial disclosures, but they need additional time in order to analyze the records disclosed to date, which number in excess of 3000 pages, and to conduct additional discovery before returning to their negotiation efforts before the Magistrate. The Parties believe that their negotiations during a continued early neutral evaluation session will be more productive and, therefore, more likely to lead to a resolution of their dispute with the benefit of additional discovery. While the Parties have been diligent in making their initial disclosures, the Parties

anticipate that additional records will be disclosed and, accordingly, additional time will be needed to analyze these records, along with any corresponding discovery, before a continued early neutral evaluation session.

STIPULATION

IT IS HEREBY STIPULATED AND AGREED, by the Parties, through their undersigned counsel, pursuant to LR IA 6-1 and 6-2, and subject to the approval of the Court, that:

1. That the early neutral evaluation session currently scheduled for August 20, 2024 at 1 p.m. be vacated; and

2. That the early neutral evaluation session be continued by approximately 90 days, subject to the calendar and convenience of the Court.

IT IS SO AGREED AND STIPULATED.

BRIAN K. BERMAN, CHTD.

HOLLY DRIGGS

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3 By: /s/ Andrew S. Clark

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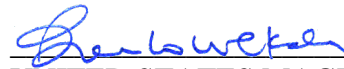
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10 Suite 300

11 Las Vegas, NV 89169

12 *Attorneys for Defendant Marbella Alfonso*
13
14

15 **IT IS SO ORDERED:**

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17 UNITED STATES MAGISTRATE/JUDGE
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19 DATED: 8/19/2024
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22 **IT IS FURTHER ORDERED** that the ENE is continued to Wednesday, November 20,
23 2024 at 10:00 a.m. via videoconference.
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